

Matthew S. Warren (State Bar No. 230565)
 Erika H. Warren (State Bar No. 295570)
 Sachli Balazadeh-Nayeri (State Bar No. 341885)
 22-3892@cases.warrenlex.com
 WARREN LEX LLP
 2261 Market Street, No. 606
 San Francisco, California, 94114
 +1 (415) 895-2940
 +1 (415) 895-2964 facsimile

David I. Berl (*pro hac vice*)
 Adam D. Harber (*pro hac vice*)
 Elise M. Baumgarten (*pro hac vice*)
 Melissa B. Collins (*pro hac vice*)
 D. Shayon Ghosh (State Bar No. 313628)
 Arthur John Argall III (*pro hac vice*)
 Andrew G. Borrasso (*pro hac vice*)
 WILLIAMS & CONNOLLY LLP
 680 Maine Avenue S.W.
 Washington, D.C., 20024
 +1 (202) 434-5000
 +1 (202) 434-5029 facsimile

*Attorneys for Plaintiffs Gentex Corporation
 and Indigo Technologies, LLC*

Ellisen Shelton Turner (SBN #224842)
 Joshua Glucoft (SBN #301249)
 KIRKLAND & ELLIS LLP
 2049 Century Park East, Suite 3700
 Los Angeles, CA 90067
 Tel: (310) 552-4200
 Fax: (310) 552-5900
 ellisen.turner@kirkland.com
 josh.glucoft@kirkland.com

Akshay S. Deoras (SBN #301962)
 Yan-Xin Li (SBN #332329)
 KIRKLAND & ELLIS LLP
 555 California Street
 Tel: (415) 439-1400
 Fax: (415) 439-1500
 akshay.deoras@kirkland.com
 yanxin.li@kirkland.com

Jeanne M. Heffernan (admitted *pro hac vice*)
 KIRKLAND & ELLIS LLP
 401 Congress Avenue
 Austin, TX 78701
 Tel: (512) 678-9100
 Fax: (512) 678-9101
 jheffernan@kirkland.com

*Counsel for Defendants Meta Platforms, Inc. and
 Meta Platforms Technologies, LLC*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

GENTEX CORPORATION and INDIGO
 TECHNOLOGIES, LLC,

Plaintiffs,

THALES VISIONIX, INC.,

Involuntary Plaintiff,

v.

META PLATFORMS, INC. and META
 PLATFORM TECHNOLOGIES, LLC,

Defendants.

Case No. 4:22-cv-3892-YGR

**STIPULATION TO WITHDRAW
 DEFENDANT'S ADMINISTRATIVE
 MOTION TO CONSIDER WHETHER
 ANOTHER PARTY'S MATERIAL
 SHOULD BE SEALED**

Judge: Hon. Yvonne Gonzalez Rogers

Under Civil Local Rule 79-5, plaintiffs Gentex Corporation and Indigo Technologies, LLC (collectively “Gentex”) and defendants Meta Platforms, Inc. and Meta Platforms Technologies, LLC (collectively “Meta”) hereby stipulate as follows:

WHEREAS, on March 2, 2023, Meta filed its Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed, Docket No. 128;

WHEREAS, some material subject to the sealing motion in Docket No. 128 is subject to claims of confidentiality by non-party Eric Foxlin;

WHEREAS, Mr. Foxlin has informed the parties that in light of the standard for sealing documents filed with this Court, he will not seek to keep these materials under seal;

WHEREAS, the remaining material subject to the sealing motion in Docket No. 128 is subject to claims of confidentiality by Gentex; and

WHEREAS, in light of the standard for sealing documents filed with this Court, Gentex will not seek to keep these materials under seal;

WHEREAS, no documents remain subject to the sealing motion in Docket No. 128;

NOW, THEREFORE, the parties hereby stipulate and agree as follows:

1. Defendant’s Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed, Docket No. 128, is moot; and

2. Meta may file unredacted versions of Docket Nos. 129-13, 129-14, 129-22, 129-25, 129-27, 129-28, 129-29, 129-34, and 129-35.

Date: March 9, 2023

Respectfully submitted,



/s/ Joshua Glucoft

Matthew S. Warren (State Bar No. 230565)
Erika H. Warren (State Bar No. 295570)
Sachli Balazadeh-Nayeri (State Bar No. 341885)
22-3892@cases.warrenlex.com
WARREN LEX LLP
2261 Market Street, No. 606
San Francisco, California, 94114
+1 (415) 895-2940
+1 (415) 895-2964 facsimile

Ellisen Shelton Turner (SBN #224842)
Joshua Glucoft (SBN #301249)
KIRKLAND & ELLIS LLP
2049 Century Park East, Suite 3700
Los Angeles, CA 90067
Tel: (310) 552-4200
Fax: (310) 552-5900
ellisen.turner@kirkland.com
josh.glucoft@kirkland.com

David I. Berl (*pro hac vice*)
Adam D. Harber (*pro hac vice*)

Akshay S. Deoras (SBN #301962)
Yan-Xin Li (SBN #332329)

Elise M. Baumgarten (*pro hac vice*)
Melissa B. Collins (*pro hac vice*)
D. Shayon Ghosh (State Bar No. 313628)
Arthur John Argall III (*pro hac vice*)
Andrew G. Borrasso (*pro hac vice*)
WILLIAMS & CONNOLLY LLP

KIRKLAND & ELLIS LLP
555 California Street
Tel: (415) 439-1400
Fax: (415) 439-1500
akshay.deoras@kirkland.com
yanxin.li@kirkland.com

680 Maine Avenue S.W.
Washington, D.C., 20024
+1 (202) 434-5000
+1 (202) 434-5029 facsimile

Jeanne M. Heffernan (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
401 Congress Avenue
Austin, TX 78701
Tel: (512) 678-9100
Fax: (512) 678-9101
jheffernan@kirkland.com

*Attorneys for Plaintiffs Gentex Corporation
and Indigo Technologies, LLC*

*Counsel for Defendants Meta Platforms, Inc.
and Meta Platforms Technologies, LLC*

SIGNATURE ATTESTATION

Under Civil L.R. 5-1(h)(3), I attest that all electronic signatories to the foregoing document have concurred in this filing.



Sachli Balazadeh-Nayeri